

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Inam Naji,

Plaintiff,

vs.

Fluor Enterprises, Inc., d/b/a Fluor  
Corporation,

Defendant.

Case No. \_\_\_\_\_

**NOTICE OF REMOVAL**

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA;  
COURT OF COMMON PLEAS FOR GREENVILLE COUNTY, SOUTH CAROLINA;  
AND ALL PARTIES AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT the above-captioned matter, originally filed in the Court of Common Pleas for Greenville County, South Carolina, has been removed to the United States District Court for the District of South Carolina, Greenville Division, on the following grounds:

1. The above-captioned civil action was filed in the Court of Common Pleas for Greenville County, South Carolina, on May 3, 2019, and was served upon Defendant Fluor Enterprises, Inc. (hereinafter “Fluor”), who is improperly identified in the Complaint as “Fluor Enterprises, Inc., d/b/a Fluor Corporation,” on May 22, 2019. A copy of the Summons and Complaint is attached hereto as **Exhibit A**. Fluor is filing this Notice of Removal within thirty (30) days of service of the original Complaint as required by 28 U.S.C. § 1446(b).

2. Plaintiff’s Complaint purports to assert causes of action under 42 U.S.C. § 2000e *et seq.* Therefore, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 as an action of a civil nature founded upon a claim or right arising under the laws of the United States.

3. Accordingly, this action may be removed to this Court pursuant to the provisions of 28 U.S.C. § 1441(a).

4. Fluor is providing the Clerk of Court from which this action was removed with a copy of this Notice of Removal as required by 28 U.S.C. § 1446(d).

WHEREFORE, Fluor prays that this Honorable Court accept this Notice of Removal and hereby undertake jurisdiction in the above-captioned cause of action now pending in the Court of Common Pleas for the County of Greenville, South Carolina, that the same be removed to this Honorable Court, and that all proceedings in this case in the Court of Common Pleas for the County of Greenville, South Carolina be stayed.

Respectfully submitted,

s/ Jennifer S. Cluverius

Jennifer S. Cluverius Fed ID No. 9992

Ashley R. Parr Fed ID No. 12304

NEXSEN PRUET, LLC

55 East Camperdown Way, Suite 400 (29601)

Post Office Drawer 10648

Greenville, South Carolina 29603-0648

Telephone: 864.370.2211

Facsimile: 864.282.1177

[JCluverius@nexsenpruet.com](mailto:JCluverius@nexsenpruet.com)

[AParr@nexsenpruet.com](mailto:AParr@nexsenpruet.com)

Attorneys for Defendant

Fluor Enterprises, Inc.

June 21, 2019

Greenville, South Carolina